UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

AUTHORS GUILD, DAVID BALDACCI, MARY BLY, MICHAEL CONNELLY, SYLVIA DAY, JONATHAN FRANZEN, JOHN GRISHAM, ELIN HILDERBRAND, CHRISTINA BAKER KLINE, MAYA SHANBHAG LANG, VICTOR LAVALLE, GEORGE R.R. MARTIN, JODI PICOULT, DOUGLAS PRESTON, ROXANA ROBINSON, GEORGE SAUNDERS, SCOTT TUROW, and RACHEL VAIL, individually and on behalf of others similarly situated,
 	
 ,
 	
                                     Plaintiffs,
 	
           v.
 	
 OPENAI INC., OPENAI LP, OPENAI LLC, OPENAI GP LLC, OPENAI OPCO LLC, OPENAI GLOBAL LLC, OAI CORPORATION LLC, OPENAI HOLDINGS LLC, OPENAI STARTUP FUND I LP, OPENAI STARTUP FUND GP I LLC, and OPENAI STARTUP FUND MANAGEMENT LLC,
 	
                                     Defendants.
	Case No. 23-cv-08292-SHS-OTW
	
	 DECLARATION OF ANDREW M. GASS IN SUPPORT OF MOTION TO ADMIT COUNSEL *PRO HAC VICE*

I, ANDREW M. GASS, declare as follows:

1. I am a partner at the law firm of Latham & Watkins LLP, and I am counsel for Defendants

    OpenAI, Inc., OpenAI L.P., OpenAI GP, L.L.C., OpenAI, L.L.C., OpenAI OpCo, LLC,

    OpenAI Global, LLC, OAI Corporation LLC, OpenAI Holdings, LLC, OpenAI Startup Fund

    I, L.P., OpenAI Startup Fund GP I, L.L.C., and OpenAI Startup Fund Management, LLC

    (together, "OpenAI").

2. I respectfully submit this declaration in support of my Motion to Admit Counsel *Pro Hac*

Vice.

3.   I am a member in good standing of the bar of the State of California and was admitted on

December 5, 2008.

4.   I attach a certificate of good standing from the Supreme Court of the State of California,

which was issued within thirty days of this filing, as **Exhibit A** to my motion for admission

pro hac vice.

5.   I have never been convicted of a felony or been the subject of any criminal conviction.

6.   I have never been censured, suspended, disbarred or denied admission or readmission by

any court.

7.   I have never been the subject of a disciplinary sanction and there are no disciplinary

proceedings presently pending against me.

Wherefore your declarant respectfully submits that he be permitted to appear as counsel

pro hac vice in this one case on behalf of Defendants OpenAI, Inc., OpenAI, L.P., OpenAI GP,

L.L.C., OpenAI, L.L.C., OpenAI OpCo, LLC, OpenAI Global, LLC, OAI Corporation LLC,

OpenAI Holdings, LLC, OpenAI Startup Fund I, L.P., OpenAI Startup Fund GP I, L.L.C., and

OpenAI Startup Fund Management, LLC (together, "OpenAI").

I declare under penalty of perjury that the foregoing is true and correct.

Dated: November 22, 2023

/s/ Andrew M. Gass
Andrew M. Gass